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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re FACEBOOK BIOMETRIC  
INFORMATION PRIVACY LITIGATION

) Master File No. 3:15-cv-03747-JD

) CLASS ACTION

This Document Relates To:

ALL ACTIONS.

) DECLARATION OF SHAWN A.  
) WILLIAMS IN SUPPORT OF PLAINTIFFS'  
) MOTION FOR PARTIAL SUMMARY  
) JUDGMENT

[REDACTED]

1 I, Shawn A. Williams, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of  
3 California and before this District Court. I am a member of the law firm Robbins Geller Rudman &  
4 Dowd LLP, counsel of record for plaintiffs in the above-entitled action. I make this Declaration in  
5 Support of Plaintiffs' Motion for Partial Summary Judgment. I have personal knowledge of the  
6 matters stated herein and, if called upon, I could and would competently testify hereto.

7 2. Attached are true and correct copies of the following exhibits:

- 8 Exhibit 1: [REDACTED] [FILED UNDER SEAL];
- 9 Exhibit 2: [REDACTED] [FILED UNDER SEAL];
- 10 Exhibit 3: [REDACTED] [FILED UNDER SEAL];
- 11 Exhibit 4: Article titled, "At Last, Facebook Acquires Face.com" Haaretz.com, dated  
12 June 20, 2012;
- 13 Exhibit 5: [REDACTED] [FILED UNDER SEAL];
- 14 Exhibit 6: [REDACTED] [FILED UNDER  
15 SEAL];
- 16 Exhibit 7: [REDACTED] [FILED UNDER SEAL];
- 17 Exhibit 8: [REDACTED] [FILED UNDER  
18 SEAL];
- 19 Exhibit 9: [REDACTED] [FILED UNDER SEAL];
- 20 Exhibit 10: [REDACTED] [FILED  
21 UNDER SEAL];
- 22 Exhibit 11: [REDACTED] [FILED UNDER SEAL];
- 23 Exhibit 12: [REDACTED] [FILED  
24 UNDER SEAL];
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- 1 Exhibit 13: "DeepFace: Closing the Gap to Human-Level Performance in Face  
2 Verification" by Yaniv Taigman *et al.* (Bates No. FBBIPA\_00001214-  
FBBIPA\_00001221);
- 3 Exhibit 14: [REDACTED] [FILED UNDER  
4 SEAL];
- 5 Exhibit 15: [REDACTED] [FILED UNDER SEAL];
- 6 Exhibit 16: Facebook Ireland Ltd Report of Audit, dated December 21, 2011;
- 7 Exhibit 17: "Submission by 'Facebook Ireland Ltd'" to the Office of the Irish Data  
8 Protection Commissioner: Response to Complaint(s) Number: 9," received  
9 September 30, 2013;
- 10 Exhibit 18: "Facebook turns off automatic facial recognition feature for all European  
11 users in victory for privacy campaigners," DailyMail.com, dated October 16,  
12 2012;
- 13 Exhibit 19: [REDACTED] [FILED UNDER SEAL];
- 14 Exhibit 20: [REDACTED] [FILED  
15 UNDER SEAL];
- 16 Exhibit 21: [REDACTED] [FILED UNDER SEAL];
- 17 Exhibit 22: Facebook document titled "Data Policy," last revised September 29, 2016;
- 18 Exhibit 23: Transcript of Hearing Before the Subcommittee on Privacy Technology and  
19 the Law of the Committee on the Judiciary United States Senate titled "What  
20 Facial Recognition Technology Means for Privacy and Civil Liberties," dated  
21 July 18, 2012;
- 22 Exhibit 24: [REDACTED] [FILED UNDER  
23 SEAL];
- 24 Exhibit 25: [REDACTED] [FILED UNDER SEAL];
- 25 Exhibit 26: [REDACTED] [FILED UNDER SEAL];
- 26 Exhibit 27: "Facebook buys Israeli facial recognition firm Face.com," BBC News, dated  
27 June 19, 2012;
- 28 Exhibit 28: [REDACTED] [FILED UNDER SEAL];

1 Exhibit 29: "Facebook hit with tough questions on facial recognition in Senate hearing,"  
2 by Ricardo Bilton, VentureBeat, dated July 18, 2012; and

3 Exhibit 30:

4 [REDACTED]  
5 [FILED UNDER SEAL].

6 I declare under penalty of perjury under the laws of the State of California that the foregoing  
7 is true and correct. Executed this 16th day of March, 2018, at San Francisco, California.

8 s/Shawn A. Williams  
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10 SHAWN A. WILLIAMS  
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